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Insurance Company

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION  
14

15 HADAR MEIRI, an individual,  
16 Plaintiff,

17 v.

18 HARTFORD LIFE AND ACCIDENT  
19 INSURANCE COMPANY,  
20 Defendant.

Case No. 3:16-cv-00103-JST

**STIPULATION AND  
[PROPOSED] ORDER FOR ONE-  
WEEK CONTINUANCE OF  
HEARING FOR CROSS-MOTIONS  
FOR JUDGMENT UNDER FRCP  
RULE 52 AND MOTION TO  
STRIKE**

**CURRENT DATE: March 9, 2017  
CURRENT TIME: 2:00 p.m.**

**PROPOSED DATE: March 16, 2017  
PROPOSED TIME: 2:00 p.m.**

Complaint Filed: January 7, 2016

24 By and through their counsel of record, Plaintiff Hadar Meiri ("Meiri") and  
25 Defendant Hartford Life and Accident Insurance Company ("Hartford"), hereby  
26 stipulate and respectfully request that the Court permit a one-week continuance of  
27 the hearing date on all motions set for March 9 to March 16, 2017, at 2:00 p.m.  
28 Good cause exists as follows:

1           Whereas counsel for Defendant Hartford, Melissa M. Cowan, learned on the  
 2           afternoon of February 22, 2017, that her nine-year-old daughter would require  
 3           surgery as soon as possible. For medical reasons, the surgery cannot be scheduled  
 4           for two weeks. The surgeon has now confirmed that surgery will proceed on  
 5           Thursday, March 9, 2017 at UCLA Medical Center in Los Angeles, California.

6           Whereas the parties' cross-Motions for Judgment under FRCP Rule 52 and  
 7           Plaintiff's Motion to Strike are set to be heard at 2:00 p.m. on March 9, the same  
 8           date as the surgery. Defendant's counsel requested that Plaintiff's counsel agree to  
 9           a one-week continuance of the March 9<sup>th</sup> hearing to accommodate this unexpected  
 10          medical matter. Plaintiff's counsel, Ms. Grey, graciously agreed.

11          All the briefing for the cross-Motions for Judgment (Doc. Nos. 21, 24, 29,  
 12          34, 35) and Motion to Strike (Doc. Nos. 30, 33, 36) has been completed. The  
 13          briefing on Defendant's Motion for Administrative Relief related to Plaintiff's  
 14          opening Motion (Doc. Nos. 25, 26) has likewise been submitted.

15          Whereas the parties have confirmed that the court's calendar is still open for  
 16          hearings on March 16 (although it is closed for hearings on March 9). The parties  
 17          therefore request that the hearing date for both the Cross-Motions for Judgment and  
 18          the Motion to Strike be moved from March 9, 2017 at 2:00 p.m., to March 16, 2017  
 19          at 2:00 p.m. The parties seek only a one-week continuance of the hearing date.  
 20          Currently, March 23 is not an available date for counsel. March 30 is also closed  
 21          on the court's calendar for further hearings.

22          The parties previously requested two extensions of time related to the  
 23          briefing for the cross-Motions for Judgment, with a commensurate continuance of  
 24          the hearing date. The parties first requested a continuance of the responsive motion  
 25          deadlines and trial due to the medical leave and rehabilitation of Plaintiff's counsel,  
 26          Rebecca Grey, in late October, and other conflicts. (Doc. Nos. 27, 28) Plaintiff's  
 27          responsive brief deadline was extended from November 30, 2016 to January 5,  
 28

2017; Defendant's responsive brief was extended from December 21, 2016 to February 2, 2017; and the Motion hearing moved from January 12 to February 16, 2017, at 2:00 p.m. The parties requested a second extension for Defendant's responsive brief and opposition to Plaintiff's Motion to Strike due to Defendant's counsel having to prepare for and participate in trial on January 30, 2017. (Doc. Nos. 31, 32) The court continued Defendant's opposition to Plaintiff's Motion to Strike from January 19 to February 7, 2017; Plaintiff's reply for the Motion to Strike to February 16, 2017; Defendant's responsive brief for the cross-Motion for Judgment from February 2 to February 16, 2017; and the hearing date for cross-Motions for Judgment and the Motion to Strike from February 16 to March 9, 2017 at 2:00 p.m.

Due to this unforeseen medical matter, the parties respectfully request that the pending motions be heard on March 16, 2017 at 2:00 p.m., rather than March 9.

IT IS SO STIPULATED.

Dated: February 27, 2017

The Grey Law Firm, P.C.  
Rebecca Grey  
Kate Rozenvasser

By: /s/ Rebecca Grey [as authorized on 2/27/17]  
Rebecca Grey  
Attorneys for Plaintiff Hadar Meiri

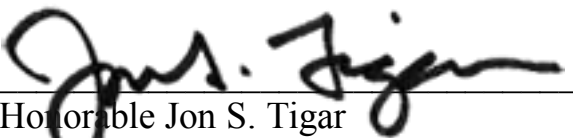
Dated: February 27, 2017

Burke, Williams & Sorensen, LLP  
Melissa M. Cowan

By: /s/ Melissa M. Cowan  
Melissa M. Cowan  
Attorneys Defendant Hartford Life  
and Accident Insurance Company

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

2  
3 DATED: February 27, 2017

  
Honorable Jon S. Tigar  
United States District Court Judge